Louisiana Department of Health and Hospitals - Office of Public Health
Public Water System Supervision (PWSS)
FY 2010 Program Review

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I. INTRODUCTION

Title 40 of the Code of Federal Regulations (40 CFR) Part 142.17 (a)(1) states: At least annually the Administrator shall review, with respect to each State determined to have primary enforcement responsibility, the compliance of the State with the requirements set forth in 40 CFR part 142, subpart B, and the approved State primacy program. This Report summarizes the required primacy end-of-year (EOY) review of the Louisiana Department of Health and Hospitals (LDHH) Office of Public Health (OPH) Public Water Supply Supervision Program (PWSS) Program by the Environmental Protection Agency (EPA) Region 6 Source Water Protection Branch, Drinking Water Section.

The LDHH program elements, which were previously adopted by the State and approved by EPA to meet 40 CFR 142.10 primacy requirements, are examined as well as State activities to meet new primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act (SDWA). The LDHH achievements and activities are highlighted throughout the report. Attachment A contains a chart of primacy status by rule, Attachment B shows the sanitary surveys conducted within each region and Attachment E contains the progress towards addressing the items identified during past data verification audits.

II. BACKGROUND

On Thursday, December 16, 2010, the EPA Region 6 Drinking Water Section conducted the annual EOY review of the PWSS Program at the LDHH Office of Public Health in Baton Rouge. The following people participated in the review:

EPA Region 6

- Blake Atkins - Chief, Drinking Water Section
- Vanessa Kelly - Louisiana State Program Manager

The following EPA staff participated via conference line:

- Ashley Howard - DWSRF/PWSS/ERG Project Officer
- Maurice Rawls – Chief, SRF Section
- Nancy Ho – DBP Rule Manager
- Nichole Foster – GWR Data Manager
- Dawn Ison – GWR/Emergency Response Manager
- Andy Waite – SDWIS Program Manager

LDHH

- Glenn T. Cambre – CEHS Executive Director
- Myra Lowe – OPH Finance Director
- Jake Causey – Chief Engineer
- T. Jay Ray – DWRLF Manager
- Brandon Taylor – Engineer
- Kathi Masinter – Admin Program Specialist
- Kate Gilmore – Program Manager
- Sean Nolan – Engineer

- Leslie Lemon – Engineer
- Dinah Millet – Operator Certification Administrator

III. PRIMACY REQUIREMENTS

As part of the FY 2010 PWSS grant agreement, EPA requires LDHH to maintain primacy for the State's PWSS program. One of the major requirements to maintaining primacy is for the State to adopt drinking water regulations which are no less stringent than the National Primary Drinking Water Regulations (NPDWRs).

IV. RULE ADOPTION and IMPLEMENTATION

LDHH has often been several years behind in adopting regulations and well beyond the regulatory maximum 2-year extension period. Still, LDHH has been implementing the regulations, determining compliance, issuing informal notices of violation, requiring public notice and all other aspects of rule implementation, except for formal enforcement. Formal enforcement such as the issuance of Administrative Orders is being carried out by EPA Region 6 enforcement staff.

The following table outlines the State's status on rule adoption. The rule deadlines do not include the allowable 2-year extensions. A complete chart of compliance responsibilities can be found in Attachment A.

<table>
<tr><th rowspan="2">Rule Name</th><th rowspan="2">Deadline</th><th colspan="2">State Adoption</th><th colspan="2">EPA Approval</th></tr>
<tr><th>Status</th><th>Date</th><th>Status</th><th>Date</th></tr>
<tr><td>PN Rule</td><td>5/6/04</td><td>Adopted by Reference</td><td>Mar-09</td><td colspan="2" rowspan="5">Received Primacy Package January 2011</td></tr>
<tr><td>Radionuclide Rule</td><td>12/7/04</td><td colspan="2" rowspan="3">Adopted by Reference Jun-09</td></tr>
<tr><td>Filter Backwash Rule</td><td>6/8/05</td></tr>
<tr><td>Arsenic Rule</td><td>1/21/05</td></tr>
<tr><td>LT1 Rule</td><td>1/14/06</td></tr>
<tr><td>Stage 2 DBP Rule</td><td>1/4/08</td><td>Projected</td><td>Nov-11</td><td>Projected</td><td>Jan 2012</td></tr>
<tr><td>LT2 ESWTR</td><td>1/4/08</td><td>Projected</td><td>Nov-11</td><td>Projected</td><td>Jan 2012</td></tr>
<tr><td>Ground Water Rule</td><td>11/22/08</td><td>Projected</td><td>Nov-12</td><td>Projected</td><td>Jan 2013</td></tr>
<tr><td>Lead/Copper Short Term Revisions</td><td>10/10/09</td><td colspan="4">Submitted 2-yr Extension Request Dec-09</td></tr>
</table>

LDHH has primacy for the new Public Water System (PWS) definition, Administrative Penalty Authority, Consumer Confidence Report (CCR), Total Coliform Rule (TCR), Interim Enhanced Surface Water Treatment Rule (IESWTR), Stage 1 Disinfectants and Disinfection By-products Rule (Stage 1 DBPR), Lead-Copper Rule (LCR) minor revisions, and the Interim Radionuclide Rule. The following rules are projected for EPA approval in the next few months: Public Notification (PN) rule, Long Term 1 ESWTR (LT1), Arsenic, Filter Backwash and Recycling Rule (FBRR), and the Revised Radionuclide Rule.
The next batch pending adoption includes: Stage 2 DBPR, LT2 ESWTR, Ground Water Rule, and the Lead/Copper short-term revisions. Jake Causey's plan is to work on Stage 2 and LT2 first with hopes to have the state rules promulgated and primacy package submitted to EPA by the end of 2011. He expects to have the GWR adoption and primacy process completed by the end of 2012.

	Rule	**State Contact**	**EPA Contact**	**EPA Phone**
•	PN	Mac Volentine	Andrea Abshire	(214) 665-6706
•	LCR	Sean Nolan	Andrea Abshire	(214) 665-6706
•	Rads & Arsenic	Brandon Taylor	Kim Ngo	(214) 665-7158
•	DBPR 1 & 2	Brandon Taylor	Nancy Ho	(214) 665-3179
•	LT-1 & 2	Sean Nolan	Mark McCasland	(214) 665-8088
•	GWR	Kate Gilmore	Dawn Ison	(214) 665-2162

A. Stage 1 and 2 Disinfectant and Disinfection By-Products Rules

Louisiana requires mandatory disinfection, although prior to 1996, systems were permitted to apply for a waiver from the requirement based on their TCR compliance history and site-specific conditions. These waivers are no longer offered to systems, and are revoked if a system has a TCR violation. Currently there are about 50 systems that have maintained their waivers.

For Stage 1 and 2 DBPR, approximately 1,500 systems collect and send Total Trihalomethane (TTHM) and Haloacetic Acid (HAA5) samples to certified labs for analysis. Results are forwarded to the Central Office. All labs will soon be required to provide results electronically. The rule manager then calculates the running annual average (RAA) for TTHMs and HAA5s and tracks whether systems monitor during the correct timeframe.

For Stage 1 compliance monitoring, systems can receive violations if TTHM or HAA5 exceeds the Maximum Contaminant Level (MCL). The Stage 2 rule is for investigative purposes only, so no MCL violations can be incurred. However, systems are required to monitor and report (M/R) for both Stage 1 and 2. Since the Stage 2 rule is still pending state adoption (2-yr extension expired January 4, 2010), violations are reported to EPA for enforcement.

Stage 2 compliance updates are sent by EPA per the bi-weekly download request from LDHH. On January 5th, 2010, there were 177 noncompliant systems that have been referred to EPA enforcement for issuance of an Administrative Order. Every 2 weeks EPA sends a spreadsheet of the Stage 2 DBPR – Initial Distribution System Evaluation (IDSE) status, including Very Small System (VSS) waivers, 40/30 Certification, and Standard Monitoring Plan submission of all systems. A list of all systems that are required to conduct IDSE monitoring and the systems' corresponding IDSE Report submission status is also included. The IDSE Report is 1) a summary of the system's Stage 1 DBPR and Stage 2 DBPR IDSE sample results and 2) serves as the Stage 2 DBPR Compliance Monitoring Plan for the year 2012 and beyond.

The State has three months after the due date for the Stage 2 DBPR IDSE Report to complete its review of the water systems' IDSE Report. The State must notify water systems if an IDSE Report is disapproved. As of October 1, 2010, all IDSE Reports must have been reviewed by the State. As of 11/26/2010, there were 74 systems that had not been approved by LDHH.

In Louisiana, there are 1030 systems that must comply with the Stage 2 DBPR. Of these, 800 water systems qualified for an exemption from the IDSE Report requirements of the Rule. These water systems will need to submit a Stage 2 DBPR compliance monitoring plan to LDHH around the year 2012 or 2013. Approximately 750 systems will begin compliance monitoring in the year 2013. EPA recommends that LDHH begin planning now for early plan reviews in order to distribute and manage the associated workload. Brandon Taylor has taken over as the LDHH DBP rule manager. Over the last few months he has caught up with Stage 1 DBPR implementation and has also been working to transfer everything into SDWIS to prepare for 2012 long-term monitoring.

During DBP2 Rule implementation, LDHH took on the bulk of the workload but asked for EPA Region 6's assistance with sharing workload associated with the review of monitoring plans and EPA Enforcement's issuance of Administrative Orders for noncompliant water systems. Listed below is a summary of roles and responsibilities for both Stage 2 DBPR and LT2.

EPA Region 6's role and work activities for LDHH:

1) State-wide violation status lists for the Stage 2 DBPR and LT2 ESWTR.
2) Enforcement referrals for noncompliant systems.
3) Issuance of AOs.

LDHH's activities:

1) Compliance assistance activities such as phone calls, notice of violation letters, approval letters, etc.
2) Maintaining the DCTS database.

3) Entering violation determinations made by EPA Region 6 into SDWIS.

B. Surface Water Treatment Rule, Interim and Long Term 1 and 2 Enhanced Surface Water Treatment Rules

Under the Surface Water Treatment Rule (SWTR), states were required to determine ground water sources under the direct influence of surface water. LDHH made these determinations, and is classifying ground water systems under the influence of surface water (GWUDI) as surface water systems and thus subject to all applicable surface water treatment rule regulations. This includes mandated filtration and Cryptosporidium monitoring which has now been completed for all surface water systems.

C. Ground Water Rule

The Ground Water Rule (GWR) was effective January 8, 2007 and compliance determinations began December 1, 2009. This rule requires water systems to perform Triggered Source Monitoring if they are notified of a positive Total Coliform Rule (TCR) sample. LDHH will cover the cost of additional samples since they already take about 65,000 samples for the TCR. Some systems may, instead, choose to conduct Compliance Monitoring (4-log treatment) to avoid source sampling requirements. The GWR also requires water systems to respond to State requests for Corrective Actions and additional Source Water Assessment Monitoring. LDHH is relying on the Electronic Sanitary Survey SWIFT tool to fully implement the GWR.

Overall the GWR process has been going well. There were only about 20 Triggered Monitoring Events and the Regions have been communicating well with EPA to quickly send any necessary violation letters. A few systems will soon need a template for Treatment Technique violations, so Dawn Ison is working on a template letter. Kate Gilmore expressed the need for help in documenting 4-log treatment and monitoring requirements within SDWIS. Andy Waite will continue to assist with SDWIS database issues. According to Andy, the change to SDWIS 3.0 won't cause a problem with the GWR components. Still there is some work to be done, such as sorting out sample points in systems that are partially under 4-log treatment.

D. Lead and Copper Rule

LDHH has had four Lead-Copper Rule (LCR) Rule Managers in the past five years. The compliance determination for LCR has now been completely moved to SDWIS/State. The deadline for LDHH to adopt the LCR short-term revisions was October 2010, but In December 2009, a 2-year extension was requested. LDHH now has until December 2011 to submit a final primacy revision package with a revised crosswalk. On July 2, 2010,

LDHH submitted an updated standard operating procedure (SOP) for the Lead and Copper corrosion control activities that LDHH is implementing to alleviate compliance issues associated with action level exceedances. EPA approved the updated standards, but emphasized that the alteration of compliance dates is only an interim solution.

V. OTHER INITIATIVES and STATUTORY REQUIREMENTS

On August 6, 1996, the SDWA Amendments of 1996 were signed into law. This section of the report covers Louisiana's achievements in implementing the activities contained in the 1996 SDWA Amendments.

A. Safe Drinking Water Information System

LDHH has used SDWIS/State since 2003 and largely credits the data system for the improvement in TCR compliance tracking, noting how critical it is for their decentralized program.

Scheduling

LDHH plans to reevaluate sample schedules and monitoring periods, to ensure they are correctly configured for compliance determination. Generic schedules have been entered, but LDHH wants to evaluate whether systems may require unique schedules. Sample collection order is determined by the regions, based on the last sample date, geography, and public health concerns. Overall, LDHH is happy with SDWIS scheduling and the summaries that are generated.

Lab Reporting

LDHH will continue to use Labworks until the new STAR-Laboratory Information Management System (STARLIMS) is ready. Due to serious lab understaffing issues, the pilot has been delayed until Spring 2011. LDHH plans for the State Lab to use this system to report LCR, chemical, and radionuclide data. LDHH central office staff are also working with the lab to get bacteriological results and chlorine residuals reported electronically. Once the electronic data are available from STARLIMS, the state envisions that the workload will be reduced. For instance, LDHH will be able to calculate MRDLs automatically, rather than manually calculating and entering monthly averages.

Compliance is tracked outside of SDWIS for the following:

- **TOCs** - Total Organic Carbon (TOC) data are not easily tracked in SDWIS, since it's not set up to manage alternative treatment methods such as enhanced coagulation. Each of the 4 Districts use different Excel spreadsheets to track data received from water systems for the SWTR and TOC.

- **MRDLs** - Similarly, compliance with the Maximum Residual Disinfectant Level (MRDL) is tracked manually, although the state hopes to automate this process with Lab-to-State (LTS) reporting.
- **Phase II/V** - The state is required to conduct a manual compliance review even through there is the capability to run compliance in SDWIS. LDHH still needs to migrate Phase II/V Schedules for new systems.
- **Radionuclides**
- **Turbidity**
- **Entry point chlorine residuals** - Currently stored as hard copies in the MORs at the Regional Offices.
- **DBPR and Initial Distribution System Evaluations (ISDE) - DBP/ANALAB** Workgroup has made progress. Sample results now going in faster.
- **LT2 ESWTR**

B. Sanitary Surveys

Regional personnel (including engineers and sanitarians) conduct sanitary surveys. A chart of the surveys conducted by LDHH Region can be found in Attachment B. For Federal FY 2010, LDHH conducted 422 surveys which is less than past years due to the SWIFT tool transition. The State conducted 546 surveys in FY 2009, 521 in FY 2008, and 261 in FY 2007. Quarterly status reports by Kate Gilmore have brought about competition between Regional Offices on meeting targets, producing reports and getting results into SDWIS/State. The tracking matrix helped identify that some Regions had too many systems and couldn't complete sanitary surveys on schedule. Therefore, in recent years, the state added several staff devoted to sanitary surveys. Additional improvements were realized through the multi-region Weekly Net Meetings. These discussions have been helpful to get feedback and advice for problems that are seen in the field.

C. Area Wide Optimization Program (AWOP)

LDHH plans to participate in all upcoming EPA Region 6 events with the help of ASDWA funding to cover travel.

Status Component Activities:

- Sean Nolan made a presentation on AWOP at the LRWA conference on July 22, 2010 which included a general overview of AWOP, available AWOP tools, and ongoing development in the groundwater arena. LDHH continues to look for other opportunities to include AWOP presentations such as Rural Water (6x/year training) and the State's WQTC in December.
- The FY 2009 plant ranking has been completed. This ranking completed the 11th year of "status component" tracking.

- Louisiana's 5th Summary Report was previously completed (covering FY 2006-07-08). This report includes 10 years of "Status" component data. The next summary report will be completed after the FY 2011 ranking is completed.

Evaluation Component Activities:

- No additional CPEs were conducted. The last CPE (#36) was in Sep 2006. No additional activities are planned.

Follow Up Component Activities:

- The 4th turbidity-based PBT series has finished. Sessions 1-5 were held from June 2008 – May 2009. Six Louisiana plants and one Texas plant participated. A one-day follow up session was scheduled with plants and facilitators on September 8, 2010, but no plants were able to attend.
- EPA Region 6 has requested the 4 hour MORs for all participating plants for the one year post PBT. This will be provided by LDHH Region 7 staff.

Maintenance Component Activities:

- LA plans to revisit/update the Maintenance Component strategy this year.

D. Homeland Security

LDHH is fully integrated with GOHSEP (Governor's Office of Homeland Security and Emergency Preparedness) and ESF (Emergency Support Function) 12. Under Department of Energy (DOE) coordination, ESF-12 is an integral part of the larger DOE responsibility of maintaining continuous and reliable energy supplies for the United States. With the EPA, LDHH assists in identifying critical water and wastewater systems requiring priority power restoration. LDHH staff is trained in both NIMS (National Incident Management System) and ICS (Incident Command System). Other state agencies rely on LDHH, operating out of ESF-12 related to drinking water. These actions involve bottled water delivery and monitoring of the water quality provided via tanker trucks.

The Louisiana Safe Drinking Water Program (SDWP) was very active in performing the four primary tasks under the Water Protection Coordination Grant for Counter-Terrorism Activities from 10/1/09 to 4/30/10.

Task 1: Continued Development of GOHSEP Procedures for Water Systems

This task consists of activities to build and strengthen the relationships with the Coast Guard, the Corps of Engineers, the Department of Homeland Security, FEMA, the CDC, the DEQ, and the Parish EOCs on policies and procedures for response and reimbursement during an emergency. Issues such as use of point-of-use devices, the

use of emergency generators, the use of emergency wells, contracts for tanker water, testing of tanker water, source water provision contracts for tanker water supply, distribution and management of bottled water, and use of volunteer agencies, such as LRWA and LAWARN to assist water systems in an emergency are being addressed.

Task 2: Water Security Program Development and Implementation

The Water Security Engineer continues to manage the Water Security Program, including managing SDWP team operations at GOHSEP, coordinating Homeland Security Information Network (HSIN) activities, and coordinating with EPA and other agencies on security activities. GOHSEP is assisting the SDWP in regularly performing operator training during the 8-hour Very Small Water System Training sessions held around the state.

Task 3: Emergency Response Exercises

This task consisted of developing and conducting internal and external table top exercises and emergency response drills to test established Standard Operating Procedures for responding to incidents at Community Water Systems. Participants include: SDWP, GOHSEP, DEQ, Parish EOC, and water system staff. Such an exercise was held with LAWARN on April 20-21, 2010.

Task 4: Communications, Outreach and Training

The Water Security Engineer published operator training materials related to security initiatives and made them available to water systems. The Water Security team at GOHSEP worked with the GOHSEP Branch Manager to increase posting of information on WEB EOC for emergency events related to drinking water and attended the LAWARN tabletop exercise in April 2010.

The Homeland Security Grant ($112,364) ends September 30, 2011. No further funds for Homeland Security are anticipated at this time. LDHH would like to investigate the possibility of extending this grant to purchase tablets for field assessments. LDHH has been facing a great deal of difficulty to make purchases even if grant funds are available. There may be a work-around if EPA could purchase the equipment on behalf of LDHH. This potential arrangement needs further exploration.

E. Operator Certification

Louisiana requires all surface water systems to have a certified operator. Due to this requirement, there are many opportunities to maintain certification, especially for small

systems. A total of 11,245 operators were trained during FY 2010. During sanitary surveys or loan processing the operator's points are checked through a website, and updated contact information is collected. The database has improved greatly and is becoming more user-friendly although LDHH is still pursuing a contract for additional enhancements. LDHH has also been working on issuing ID cards for all certified operators which total approximately 8,000 for water and wastewater combined. 90% of operators now have ID cards so the next step is to acquire scanning equipment that can read these cards to quickly check their training progress or exam eligibility.

Exam schedules have changed this year. Instead of having 68 exams per year for small groups, LDHH now provides ten scheduled test dates. Anyone who attends a 32-hr course can schedule one of the ten closed exams. These exams require a pre-application process to review an operator's education and experience to make sure they are qualified. There are also two large open exams which occur during major conferences which don't require a pre-application. Due to the reduced number of exams, LDHH staff are more available to provide training opportunities for Very Small Systems.

F. Capacity Development

The Safe Drinking Water Act (SDWA) requires the state to obtain legal authority to ensure that all new community and non-transient, non-community systems have the financial, managerial, and technical (FMT) capacity to meet the National Primary Drinking Water Regulations. Also, States are required to develop and implement a capacity development strategy to assist public water systems in acquiring and maintaining FMT capacity. Failure to meet the SDWA provisions could result in a 20% withholding of DWRLF funds.

The Office of Public Health has contracts with the Louisiana Rural Water Association (LRWA) and the Community Resource Group (CRG). These contractors provide on-site assistance to water systems throughout the capacity assessment process, including help in FMT matters. Training for very small systems (population less than 500) continues to be held quarterly throughout the state.

Consolidation of water systems continues to be a program objective. Thirty-one water systems were consolidated either by absorption by a larger water system or combining with each other during FY 2010. In Louisiana, there is no law that mandates consolidation, but stricter capacity development requirements for new systems have been effective in directing the attention of potential new small systems toward the advantages of consolidation with another water system. Also, existing systems which are having difficulties are encouraged and assisted in merging with another system.

No management trainings have been conducted since 2005. The contracts division has been unable to secure a contract for a management training vendor for the past 4 years. However, LRWA and CRG have continued to provide training to water systems that request it. Also LRWA continues to offer training at its annual conference each July in Alexandria. Asset management (depreciation, infrastructure life-cycle planning, rate studies, etc.) has begun to be included in trainings. This was initially met with resistance from the USDA/Rural Development (RD) but was resolved with the formation of the Joint Funding Committee.

The LDHH Office of Engineering is helping the SRF group with contracting and Request for Proposal (RFP) support. Systems close to non-compliance are targeted as TA priorities. The goal is to assist about 20 systems per quarter but there are still more systems needing assistance than staff can provide. LDHH tried to add a 2nd circuit rider, but that required an RFP as did a contract with LRWA.

G. Consumer Confidence Reports (CCR)

The preparation and mailing of the Final CCRs to systems in the spring requires many state resources. LDHH completes compliance determination for the CCR Rule in October to save time, so that both types of reporting violations can be issued together. These include the failure to issue a report and/or failure to certify that reports are adequate. Most systems send the CCR and certification to LDHH by July 1, but some wait to send the report with their certification form before the October 1 deadline. LDHH only assigns violations if materials are missing or late. Their policy is not to assign a monitoring/reporting (M/R) violation if the CCR certification states that the CCR was distributed by July 1st. The certification form shows the self-reported distribution date with an affidavit which the system includes, along with the newspaper article. Violations are not issued for content, although the state does review and require content to meet requirements. Systems are required to re-submit and publish, rather than receive a violation.

VI. GENERAL / OTHER ITEMS

A. Organization Status

LDHH has a Central Office in Baton Rouge, 4 District Offices, and 9 Regions. The District Offices are located in New Orleans, Baton Rouge, Lafayette, and Shreveport. These Offices coordinate compliance determination and monitoring for the 9 Regions. Each Region is composed of 4 to 12 parishes of various sizes. A map of the districts and regions is included in Attachment C.

The LDHH Central Office oversees most regulations for the state's safe drinking water program, although compliance for the Total Coliform Rule (TCR) and Surface Water

Treatment Rules (SWTRs) are managed by the 4 District Offices. EPA has previously expressed concern over the coordination and accountability among offices. According to LDHH, there have been several improvements such as standard letters and forms for TCR, LT1 & 2. Also tracking of surface water systems with SDWIS has been completed in 2/3 of the Regions. Communication has been enhanced through weekly net meetings with each District along with Regional video conferences every other month. Improved coordination among offices has also been aided by new staff that look to the Central Office for guidance. Also those who have moved from the Central Office to Regions have helped unify the Regions.

A contract, known as the Louisiana Compliance Initiative (LCI), provided two clerical positions (one for the Enforcement Unit, and one for the Operator Certification Unit), along with two Circuit Riders for the Enforcement Unit. Due to budget cuts, one clerical position was eliminated and one LCI circuit rider position was eliminated. The LCI contract will expire at the end of February 2011, if not before, depending on the budget situation. LDHH–OPH has appointed Jake Causey as the new Chief Engineer, and Brandon Taylor has assumed the position of the DBPR Compliance Manager.

B. Laboratory and Sampling

- Status of New Lab and Certifications
- Sample Backlog
- Collection Schedules
- Monitoring Waivers
- Nitrates
- Entry Point Sampling

Status of New Lab and Certifications

The New Orleans laboratory is open, fully operational, and certified to analyze chemical and bacteriological samples. The ability to use this state lab will enable routine sample migrations via LTS and/or Electronic Data Interchange (EDI) - allowing for more timely and accurate reporting of data. All drinking water sampling provided by the state are being analyzed by state laboratories. LDEQ has a brand new lab they cannot afford, so LDHH is taking it over and building an annex. Having this new permanent lab located in Baton Rouge will facilitate communication with the DHH Central Office. The lab annex is expected to be complete by late 2012. With several expected retirements from the New Orleans lab, including the current lab manager who will be retiring in August 2011, it will be necessary to plan ahead for replacements.

Sample Backlog

The sample backlog from the groundwater 3-yr cycle samples is projected to be resolved by the 3rd quarter of 2011.

Collection Schedules

Sample collectors from LDHH collect all samples except for Lead and Copper tap water samples, water quality parameters (WQPs), TTHMs and HAA5s. The state provides systems with a monitoring schedule for the Lead and Copper Rule (LCR). The current priority is on Phase II/V sampling to reach the goal of every 3 years for ground water and yearly for surface water systems.

Monitoring Waivers

Louisiana has statewide waivers for dioxin and asbestos. LDHH has not developed a chemical waiver program for any other inorganic chemicals (IOCs), volatile organic compounds (VOCs), or synthetic organic chemicals (SOCs). In response to previous recommendations to adopt a waiver program, the state expressed concern that waivers are less protective of public health. However, nearly all states maintain waiver programs and demonstrate through periodic sampling that the waivers are defensible. If a waiver program was instituted, the state's sample collection burden could be dramatically reduced.

Nitrates

In the past LDHH did not require annual nitrate samples. Instead, samples were collected on the same 3-year schedule as other Phase II/V IOCs. For the first time since 2005, LDHH completed a full set of sampling for calendar year 2010 and plans to migrate in Annual Nitrate Sample Schedules and determine compliance with the Compliance Determination System (CDS).

Entry Point Sampling

All routine chemical samples are currently collected from the source. However, the state calculates compliance with the standards at the entry point. Therefore, if a routine sample result shows a chemical detect or MCL, the chemical rule manager notifies the sample collector in the Region, who then collects a sample at the entry point for confirmation.

VII. FUNDING MECHANISMS

A. Public Water Supply Supervision Grant

Louisiana was awarded a quarterly increment of $329,877 on November 23, 2010. We received the signed application from the state on December 13, 2010, which was signed by the state on December 8, 2010. The remainder of the balance is planned to be awarded on a quarterly basis.

B. Drinking Water State Revolving Fund Set-Asides

The Safe Drinking Water Loan Fund also pays for other required programs under the Safe Drinking Water Act with set-aside money. These programs include: assistance for Operator Certification, the Capacity Development Program (technical, managerial and financial assistance for water systems), Management Training for water systems, plan reviews and permits for all new water systems, and sanitary surveys. All of these programs are required to retain primacy for the Safe Drinking Water Program.

Utilization of DWSRF set-asides have been severely restricted by the lack of budget authority. This prevents LDHH from spending all the federal money they could potentially obtain. The state "contracting problem" exists whether or not grant dollars are available. It was discussed during the EOY review that EPA could possibly write a letter to the LDHH-OPH Financial Office that would clarify the intent of funding to maintain primacy programs. There are several areas in which the DHH drinking water staff could spend additional funds such as the OpCert database improvements, tablets for SWIFT sanitary surveys, LCI contracts, and LRWA management training. Currently the funds intended for a student intern have been used for ASDWA dues and software maintenance agreements.

C. Expense Reimbursement Grant

Louisiana's ERG grant has been extended to December 31, 2012. The ERG grant has $776,000 remaining to be spent. DHH would like to reinitiate the LCI contract to fund circuit riders and training classes along with additional secretarial help.

D. Louisiana Fee Program

The Safe Drinking Water Program Fee is collected from water systems as an annual charge of $2.88 per service connection. These fees support staffing of the Engineering Services that implement the drinking water program as well as the laboratory analysis of collected samples. LDHH feels their program is well-funded, however, they are in the process of increasing fees for plan and specification reviews. Also they are planning to increase the Operator Certification fees to support additional operator training.

E. Quality Assurance Requirements

a. QMP: Expires 12/2/2011
b. QAPPs: Expire 11/15/2013

VIII. DATA VERIFICATION AUDIT PROGRESS

The Data Verification (DV) Audit conducted by CADMUS was forwarded to LDHH on Dec 7th, 2009. There were many issues related to CCRs, sample backlog, nonuse of SDWIS/State for scheduling monitoring and making compliance determinations, and many instances where MCLs and M/R violations were not being reported to SDWIS/Fed. Over the course of the year, EPA and the LDHH data teams have been working intently to address all the items identified by the Data Verification Audit, performed by Cadmus in August 2008. An Excel spreadsheet summarizing the items completed and the items still in progress can be found in Attachment E. They are ranked in order of importance from A to ZC. The issues mentioned below were discussed during the EOY meeting:

Electronic Lab Reporting

With the anticipated Lab Certification Rule Publication, electronic lab reporting will soon be required. It is still undecided as to whether labs will have to interface with Lab-2-State or send an electronic file in a manner approved by the state.

Radionuclide Sampling

LDHH is working with EPA to review historical data for the possibility of grandfathering certain water systems from sampling.

SOC - 525.2 Analyses

State Labs cannot test more than 25 samples per week and often have more, due to re-sampling. It may be necessary to have the EPA Houston Lab help with the second cycle. For 2010, the Houston Lab was able to take on the additional samples, but in the future, the Lab would like to be notified earlier if LDHH will need their help.

Monitoring Waivers

The Waiver program is an ongoing issue. There is the potential for alternative monitoring, mostly for surface water systems but even for ground water systems as well. A Waiver Program would be appropriate for robustly pristine sources. LDHH contends that labs don't charge by sample, but reducing the number of samples could still help with lab capacity issues. State staff also brought up the issue of an increased number of visits to pull samples in additional years. So instead, it may be feasible to sample on a similar rotation such as having a six-year schedule overlap the three-year visits. Yet, LDHH contends that it's best to collect more samples, not less, since industry activities and pipelines may create a problem anywhere, at any time. Brandon Taylor would still like to see an example waiver from another state.

Lead and Copper Rule (LCR)

Sean Nolan is working to put LCR schedules into SDWIS. There have been difficulties getting systems to report their activities. Also, there have been odd results uncovered when reviewing three years of results. It has been a challenge keeping up with the 30 to 40 systems that keep changing their plans, sampling cycles, and corrosion control processes. Systems often ask to take more samples rather than work to install corrosion controls. There have been discussions

to investigate the size class and location categories of these water systems so that additional training can be provided to make sure samples are taken correctly. Another problem arises with the inability to invalidate sampling errors. Any exceedance leads to two verification samples taken six months apart. Once cleared, a system can return to sampling every three years.

Another issue involves tracking pH levels at water systems that have been required to have corrosion control (CC) measures in place. Facility Analyte Levels (FANLs) need to be set up in SDWIS to track their pH once they install CC treatment. Any deviations from the allowable range can lead to Treatment Technique (TT) violations. The treatment process inventory and communication with Regional Offices is hoped to improve with the new SWIFT sanitary survey tool.

CDS Reporting

The Electronic DV (e-DV) from the recent data extract will look for monitoring and reporting violations to see which schedules need to be changed. This is a good quality assurance check but won't show systems that have been placed on reduced monitoring.

Public Notice (PN) Reporting

It was noticed that 800 PNs are past due. The LDHH SOP requires both a hand delivery and newspaper announcement, so if the water system didn't satisfy either reporting requirement, then they should only get one violation not two. The state's backlog could be cut in half if only one violation was issued per system, per event. Tier 2 and 3 PNs could both be checked monthly to spread the yearly Tier 3 load more evenly. There is currently no overseer for the PN rule, so LDHH has considered consolidating compliance at the Central Office so that consistency improves and to make sure that PNs are entered into the system. This would also help alleviate the restriction Districts have for certified letters.

IX. CONCLUSIONS / RECOMMENDATIONS

Some of the highlights for LDHH this year include the progress made in addressing the DV Audit findings and action item list described in the Section Viii. There have been significant improvements in sampling schedules and data reporting. Further improvements are on track with new lab reporting rules in development, and the full use of the SWIFT Electronic Sanitary Survey Tool. LDHH has also taken large steps forward in submitting their complete primacy package for the following Rules: Public Notice, Filter Backwash Recycle, Long Term Enhanced Surface Water Treatment, Radionuclide, and Arsenic. With the recent staff changes and budget cuts it has been an even greater success to have these rules incorporated into the Louisiana State Sanitary Code.

Of concern however, the issue of state budget cuts and the difficulty in competing for budget authority has led to postponements of several projects and program improvements. The Louisiana drinking water staff would like to use federal grant dollars, but the only means is to be granted budget authority. Myra Lowe, the LDHH-OPH Chief Financial Officer, explained the difficulty in adding additional expenses to their budget as well as the lack of a mechanism to add contracts. EPA is concerned that LDHH is impaired from maintaining their programs sufficiently for primacy. Also, EPA SRF staff emphasized the need to show that federal grant money is needed and used by a state program so that future funds aren't reduced. It was suggested that EPA could potentially withhold LDHH grant funds and help direct these dollars towards state needs. Current EPA contracts could possibly be used to provide training or equipment. This option will be further evaluated.

ATTACHMENT A

Primacy Status by Rule – Compliance Responsibilities
as of December, 2010

LOUISIANA SAFE DRINKING WATER PROGRAM

DECEMBER 2010

PRIMACY STATUS BY RULE - COMPLIANCE RESPONSIBILITIES

RULE	PRIMACY	COMPLIANCE DETERMINED BY	TRACKING TOOL	MONITORED BY	VIOLATIONS DETERMINED BY	VIO/ENF ENTERED BY	COMMENTS	STATE CONTACT PERSON
TCR	STATE	DISTRICT	SDWIS ST	PARISH SANS/PWS	DISTRICT	DISTRICT	SOME DISTRICTS HAVE SUPPORTING SPREADHSHEETS THEY USE TO TRACK POSITIVES - STARLIMS ELECTRONIC DATA ENTRY PENDING	KATE GILMORE OVERSEES DISTRICTS 225-342-7274
INVENTORY	STATE	FED REP	SDWIS ST	ALL	NA	NA	REGIONS RESPONSIBLE FOR DATA UPDATES	KATE GILMORE 225-342-7274
LOCATIONAL DATA	STATE	CENTRAL OFFICE	SDWIS ST	REGIONS / SAN SURVEY	NA	NA	REVIEWED BY CENTRAL OFFICE / COORDINATED WITH DEQ SWAP PROGRAM	JOHAN FORSMAN 225-342-7309
CCR	STATE	CENTRAL OFFICE RULE MANAGER	SDWIS ST / COMPLIANCE SCHEDULES	CENTRAL	CENTRAL OFFICE RULE MANAGER	CENTRAL OFFICE RULE MANAGER / CDS	ONGOING ISSUE WITH VIOLATION DATE - WE USE 10/1	SEAN NOLAN 225-342-7495
PHASE II/V	STATE	CENTRAL OFFICE RULE MANAGER	SDWIS ST	REGIONAL SANS	CENTRAL OFFICE RULE MANAGER	CENTRAL OFFICE RULE MANAGER - CDS USED TO VERIFY	TRANSFER FROM LABWORKS TO STARLIMS PENDING	BRANDON TAYLOR 225-342-7392 LES LE'MON 225-342-7284
ARSENIC	ADOPTED 6/20/2009 PRIMACY PENDING	CENTRAL OFFICE RULE MANAGER	SDWIS ST	REGIONAL SANS	CENTRAL OFFICE RULE MANAGER	CENTRAL OFFICE RULE MANAGER	COMBINED WITH PH II/V RULE	BRANDON TAYLOR 225-342-7392
RADS								
SWTR	STATE	DISTRICT	SDWIS ST	PWS - CERTIFIED OUTSIDE LAB	DISTRICT	DISTRICT	DISTRICTS USE SDWIS STATE FOR MOR ENTRY	SEAN NOLAN 225-342-7495
IESWTR	STATE							
LT-1	ADOPTED 6/20/2009 PRIMACY PENDING							
FBWR	ADOPTED 6/20/2009 PRIMACY PENDING							
LT-2	ADOPTED 6/20/2009 PRIMACY PENDING							
DBP STAGE 1	JUNE 2004 PRIMACY	CENTRAL OFFICE RULE MANAGER	STATE DB /SDWIS ST	PWS	CENTRAL OFFICE RULE MANAGER	CENTRAL OFFICE RULE MANAGER	MOVING COMPLIANCE TO SDWIS	BRANDON TAYLOR 225-342-7392
DBP STAGE 1 MRDL	STATE	DISTRICT	SDWIS /OTHER	SAME AS TCR	DISTRICT	DISTRICT	WHEN STARLIMS READY, WILL USE SDWIS FOR COMPLIANCE	KATE GILMORE 225-342-7274
DBP STAGE 2	ADOPTION PENDING	CENTRAL OFFICE RULE MANAGER	WILL BE SDWIS	PWS	CENTRAL OFFICE RULE MANAGER	CENTRAL OFFICE RULE MANAGER	ENFORCEMENT BY EPA R6	BRANDON TAYLOR 225-342-7392
LCR	STATE	CENTRAL OFFICE RULE MANAGER	SDWIS ST	HOMEOWNER / PWS	CENTRAL OFFICE RULE MANAGER	CENTRAL OFFICE RULE MANAGER	WILL BE USING SDWIS SOON FOR COMPLIANCE DETERMINATION- CHANGING SAMPLE SCHEDULES	SEAN NOLAN 225-342-7495
LCR MINOR REVISIONS	ADOPTED 10/20/2004							
LCR SHORT TERM	EXTENSION TILL DEC 2011							
PNR	ADOPTED 3/20/2009 PRIMACY PENDING	SAME AS VIO DETERMINED BY	SDWIS ST STANDARD RESPONSE	DISTRICT	SAME AS VIO DET BY - SDWIS CDS	SAME AS VIO DET BY	SCHEDULES SETUP IN SDWIS VIA STANDARD RESPONSE SIE	MAC VOLENTINE 225-342-7510
GWR	EPA	DISTRICT	SDWIS ST	SAME AS TCR	DISTRICT	CENTRAL	EPA SENDS LETTER AND CENTRAL VALIDATES	KATE GILMORE 225-342-7274

ATTACHMENT B
Sanitary Survey Goal Summary Sheet

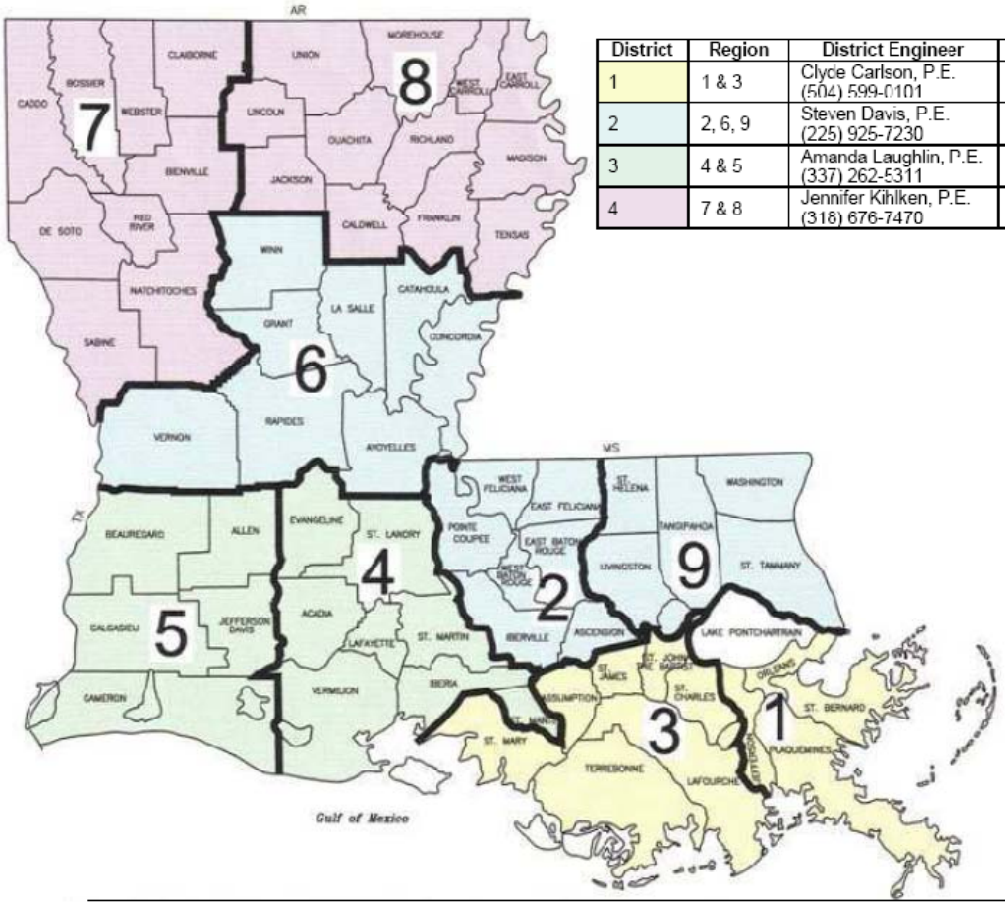
Public Water System Regional Sanitary Survey Goal Summary Sheet December 2010

Number of Surveys Per Quarter per Region Goals are shown at the bottom of the page

STATE REGIONS	REGION 1	REGION 2	REGION 3	REGION 4	REGION 5	REGION 6	REGION 7	REGION 8	REGION 9	TOTAL SYSTEMS	Sanitary Survey Frequency Requirement
Community GroundWater	0	81	4	129	73	96	153	146	212	**894**	1 every 3 years
Community GWPurchased	0	5	0	26	3	15	2	15	3	**69**	1 every 3 years
Community Surface Water	11	2	20	0	0	2	18	4	0	**57**	1 every 3 years with annual site visit
Community Surface Water Purchased	0	2	1	1	0	4	14	8	0	**30**	1 every 3 years with annual site visit
NTNC Groundwater	0	38	2	13	17	4	9	7	51	**141**	1 every 5 years
NTNC Groundwater Purchased	0	0	0	0	0	0	0	0	0	**0**	1 every 5 years
NTNC Surface Water	1	2	2	0	0	0	0	0	0	**5**	1 every 5 years with annual site visit
NTNC Surface Water Purchased	0	0	0	0	0	0	0	0	0	**0**	1 every 5 years with annual site visit
TransientNonCommunity Groundwater	3	18	11	29	10	13	25	2	104	**215**	1 every 5 years
TransientNonCommunity Surface Water	0	0	0	0	0	0	0	0	0	**0**	1 every 5 years
STATE REGIONS	**REGION 1**	**REGION 2**	**REGION 3**	**REGION 4**	**REGION 5**	**REGION 6**	**REGION 7**	**REGION 8**	**REGION 9**	**SYSTEMS**	1411
Total Active Public Water Systems Dec 2009	**15**	**148**	**40**	**198**	**103**	**134**	**221**	**182**	**370**	**1411**	**Total System Count**
Total Community Systems	11	90	25	156	76	117	187	173	215	1050	**PWS Type Summaries**
Total NTNC Systems	1	40	4	13	17	4	9	7	51	146	
Total Transient Systems	3	18	11	29	10	13	25	2	104	215	
STATE REGIONS	**REGION 1**	**REGION 2**	**REGION 3**	**REGION 4**	**REGION 5**	**REGION 6**	**REGION 7**	**REGION 8**	**REGION 9**	**SYSTEMS**	1411
Total GW Non-Purchased Systems	3	137	17	171	100	113	187	155	367	1250	**Purchased-Non-Purchased Summaries**
Total SW Non-Purchased Systems	12	4	22	0	0	2	18	4	0	62	
Total Purchased GW	0	5	0	26	3	15	2	15	3	69	
Total Purchased SW	0	2	1	1	0	4	14	8	0	30	
STATE REGIONS	**REGION 1**	**REGION 2**	**REGION 3**	**REGION 4**	**REGION 5**	**REGION 6**	**REGION 7**	**REGION 8**	**REGION 9**	**SYSTEMS**	1411
# Sys on 3 year cycle	11	90	25	156	76	117	187	173	215	1050	**Sanitary Survey and Site Visit Frequency Goals**
# Sys on 5 year cycle	4	58	15	42	27	17	34	9	155	361	
# Sys per year (3 yr)	3.67	30.00	8.33	52.00	25.33	39.00	62.33	57.67	71.67	350.00	
# Sys per year (5 yr)	0.80	11.60	3.00	8.40	5.40	3.40	6.80	1.80	31.00	72.20	
# Surveys per year (GOAL)	4.47	41.60	11.33	60.40	30.73	42.40	69.13	59.47	102.67	422.20	
# Suveys per Quarter (GOAL)	**1.12**	**10.40**	**2.83**	**15.10**	**7.68**	**10.60**	**17.28**	**14.87**	**25.67**	**105.55**	
# Annual site visits (Goal)	12	6	23	1	0	6	32	12	0	92	
# SW Site Visits per quarter (Goal)	3	1.5	5.75	0.25	0	1.5	8	3	0	23	
STATE REGIONS	**REGION 1**	**REGION 2**	**REGION 3**	**REGION 4**	**REGION 5**	**REGION 6**	**REGION 7**	**REGION 8**	**REGION 9**	**STAFF**	**Staffing**
Number of Sanitarians	2	3.5	1	2	1	1	2	1	2	15.5	
Number of Engineers	2	2	1	2	0	2	2	0	2	13	
Total Staff Region	4	5.5	2	4	1	3	4	1	4	28.5	
Goal surveys per person per Qtr	0.3	1.9	1.4	3.8	7.7	3.5	4.3	14.9	6.4	3.7	
Goal surveys per person per Yr	1.1	7.6	5.7	15.1	30.7	14.1	17.3	59.5	25.7	14.8	
GOAL Surveys per QTR	**1.12**	**10.40**	**2.83**	**15.10**	**7.68**	**10.60**	**17.28**	**14.87**	**25.67**	**105.55**	**Regional Goals**
Surveys completed 4th Qtr 2009	0	8	**4**	**16**	**8**	**25**	14	**20**	2	97	-8.55
Surveys completed 1st Qtr 2010	1	**12**	**7**	14	**8**	2	16	12	**30**	102	-3.55
Surveys completed 2nd Qtr 2010	**3**	5	1	**17**	7	6	**29**	12	21	101	-4.55
Surveys completed 3rd Qtr 2010	1	3	**5**	13	0	3	3	**19**	**26**	73	-32.55
Total SS Completed Last 4 Qtrs	**5**	**28**	**17**	**60**	**23**	**36**	**62**	**63**	**79**	**373**	**Total SS Completed Last 4 Qtrs**
Number Duplicates (>1 per year)				**1**				**5**	**1**	**7**	**Number Duplicates (>1 per year)**
Surveys completed (past FFY)	**5**	**28**	**17**	**59**	**23**	**36**	**62**	**58**	**78**	**366**	**-56.20**
GOAL Surveys per YR	**4.47**	**41.60**	**11.33**	**60.40**	**30.73**	**42.40**	**69.13**	**59.47**	**102.67**	**422.20**	**GOAL Surveys per YR**
Annual Goal Met (last 4 Qtrs)	**1**	**-14**	**6**	**-1**	**-8**	**-6**	**-7**	**-1**	**-25**	**-56**	**'+' values are regions that have exceeded goal, '-' values are regions that have not met goal**
8 Categories Starting Dec 2009	**4/5**	**1/4**	**4/17**	**2/59**	**0/23**	**34/35**	**25/31**	**19/63**	**1/79**	**SWIFT**	
STATE REGIONS	**REGION 1**	**REGION 2**	**REGION 3**	**REGION 4**	**REGION 5**	**REGION 6**	**REGION 7**	**REGION 8**	**REGION 9**		**Statewide Avg - 13.08 Surveys per person per year**

ATTACHMENT C

District & Region Map



District	Region	District Engineer	District Sanitarian
1	1 & 3	Clyde Carlson, P.E. (504) 599-0101	Yoland Brumfield, R.S. (504) 599-0101
2	2, 6, 9	Steven Davis, P.E. (225) 925-7230	Shelly Hebert, R.S. (225) 925-7230
3	4 & 5	Amanda Laughlin, P.E. (337) 262-5311	Sid Lange, R.S. (337) 262-5311
4	7 & 8	Jennifer Kihlken, P.E. (318) 676-7470	Gregg Stout, R.S. 318-676-7470

LDHH - OPH – CEHS – ENGINEERING SERVICES SECTION - (225) 342-7499

Region	Submit plans or variance requests to:	Phone
1	Metro Region I (c/o Clyde Carlson, P.E.) 1010 Common St., Suite 700 New Orleans, LA 70112	(504) 599-0101 fax (504) 599-0200
2	Capital Region II (c/o Steven Davis, P.E.) 7173A Florida Blvd Baton Rouge, LA 70806	(225) 925-7230 fax (225) 925-3832
3	Teche Region III (c/o David Boggs, E.I.) 1434 Tiger Dr Thibodaux, LA 70301	(985) 449-5007 x 345 fax (985) 449-5011
4	Acadian Region IV (c/o Amanda Laughlin, P.E.) 825 Kaliste Saloom Bldg. 3, Suite 100 Lafayette, LA 70508	(337) 262-5311 fax (337) 262-5638
5	Southwest Region V (c/o Jacob Bertrand, E.I.) 707 A East Prien Lake Road Lake Charles, LA 70601	(337) 475-3200 fax (337) 475-3222
6	Central Region VI (c/o Michael Cazes, P.E.) 5604-B Coliseum Blvd Alexandria, LA 71303	(318) 487-5262 fax (318) 487-5338
7	Northwest Region VII (c/o Jennifer Kihlken, P.E.) 1525 Fairfield Ave, Room 566 Shreveport, LA 71101	(318) 676-7470 fax (318) 676-5170
8	Northeast Region VIII (c/o Buddy Smith, P.E.) 1650 Desiard Street 2nd Floor Monroe, LA 71201	(318) 361-7201 fax (318) 362-3163
9	Southeast Region IX (c/o Brian Mistich, P.E.) 21454 Koop Dr., Suite 1C Mandeville, LA 70471	(985) 871-1300 fax (985) 871-1335

ATTACHMENT D

Violation Data for FY 2010
and
Population Served Information
as of November 30, 2010

Number of Systems in Louisiana During FY 2010
(October 1, 2009 thru September 30, 2010) as of January 14, 2011
(Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)

MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	11	8	2							21
	Stage 2										0
Interim Enhanced Surface Water Treatment Rule	Long Term 1	1	2								3
	Long Term 2										0
Lead and Copper Rule											0
Phase II/V (Chemical)		6			2						8
Rads (Radiological)											0
Surface Water Treatment Rule (SWTR)		1	1								2
Ground Water Rule (GWR)											0
Total Coliform Rule (TCR)		44	18	16	7			13			98

M and R and Consumer Notification Violations		Community			Non-Transient Non-			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	33	7	14	1						55
	Stage 2	1									1
Interim Enhanced Surface Water Treatment Rule	Long Term 1	4		1							5
	Long Term 2										0
Lead and Copper Rule		177	13		20			1			211
Phase II/V (Chemical)					1						1
Rads (Radiological)											0
Surface Water Treatment Rule (SWTR)		4									4
Ground Water Rule (GWR)		11	2	2	1			3			19
Total Coliform Rule (TCR)		33	4	2	5			8			52
Consumer Notification	CCR	110	7	1							118
	PN		1								1

Number of Violations in Louisiana During FY 2009
(October 1, 2008 thru September 30, 2009) as of November 30, 2009

MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	54	13	3							70
	Stage 2										0
Interim Enhanced Surface Water Treatment Rule	Long Term 1	1	3								4
	Long Term 2										0
Lead and Copper Rule											0
Phase II/V (Chemical)		10			4						14
Rads (Radiological)											0
Surface Water Treatment Rule (SWTR)		6	1								7
Ground Water Rule (GWR)											0
Total Coliform Rule (TCR)		55	20	17	8			15			115

M and R and Consumer Notification Violations		Community			Non-Transient Non-			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	124	18	30	4						176
	Stage 2	1									1
Interim Enhanced Surface Water Treatment Rule	Long Term 1	27		1							28
	Long Term 2										0
Lead and Copper Rule		203	14		20			1			238
Phase II/V (Chemical)					1						1
Rads (Radiological)											0
Surface Water Treatment Rule (SWTR)		23									23
Ground Water Rule (GWR)		11	3	2	1			3			20
Total Coliform Rule (TCR)		36	4	2	5			8			55
Consumer Notification	CCR	142	8	1							151
	PN		2								2

LA	GU		GUP		GW		GWP		SW		SWP		TOTAL	
	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop
C					894	2,812,712	69	81,448	57	1,950,505	30	75,182	1,050	4,919,847
NTNC					141	50,365			5	6,105			146	56,470
NC					215	52,073							215	52,073
LA TOTAL					**1,250**	**2,915,150**	**69**	**81,448**	**62**	**1,956,610**	**30**	**75,182**	**1,411**	**5,028,390**

ATTACHMENT E

Data Verification Audit
Action Plan Progress

Priority	ACTION	DHH PLAN	LDHH 11/2010 STATUS	EPA R6 12/2010 STATUS
B	Install code to automatically import data from **LIMS to SDWIS/STATE**	Starlims will be XML Ready for both Chems and TCR by end of 3rd Qtr. -- Electronic in place for Chems - STARLIMS in development for both Chems and TCR, Chems will be first. Progress good with new Lab Adm	Ongoing - Issues with Lab Personnel-working on contract to complete	
C	Require non-state labs to report electronically via XML or CSV files	Mar 2- discussed having Lab Certifier require Labs to report electronically in addition to hard copy as part of their Annual Lab Certification. We will provide crosswalk of statewide systems with PWSID, Facility ID and POC ID for them to match to.	Will require discussion and support from LDHH Management, Lab Admin and Rule Developers	Pending, rule recently written requires labs to report electronically.
E	Monitor twice all systems not eligible for grandfathering for **Ra 226/228**	Brandon will build a query showing historical Rad samples with report showing earliest sample date, last sample date, and max contaminant value for each system. EPA R6 will evaluate this info to determine how to interpret grandfathering as rule requires.	EPA R6 currently reviewing dataset to determine GF Elligibility	Preliminary review showed little GF potential. Need to plan for sampling.
F	Show progress every 6 months on **SOC biannual sampling**	Will begin pulling second SOC sample annually (total 2 per year) for all SW Systems	2010 Lab Capacity dissallows - would put us behind in GW Phase II/V-Checking into use of Houston Lab - will plan for 2011	Houston Lab came through just-in-time. Need to plan for next year. May use SW annual visits for future sampling.
H I J	Develop a waiver program for SOC, VOC, and IOC contaminants using the increased/decreased monitoring report functionality	May be revisited at a later date	Ongoing discussion between EPA R6 and LDHH	
S	Document in SDWIS/STATE actions taken by systems or state in response to **LCR** action level exceedances	Will revisit proposed compliance schedules and activities with Andrea, Mar 23	CC Implementation steps underway with LCR Workgroup (EPA-LDHH)	Both S/T pending,
T	Develop an SOP to track required optimal corrosion control implementation (in SDWIS?)		will be FANL, not Compliance Schedules	MOR format, other ideas?
U	Use the CDS functions of SDWIS/STATE to do compliance for the **Phase I-V rules**	Need to discuss with Andy - Maddie McAndrew SOP Overrides-related to Electronic Reporting Discussion above	Manual Review SOP still in place and being followed. Capability to do compliance in SDWIS is there. Need to migrate Ph II/V Schedules for new systems.	Items U and V are necessary to perform eDV audits. Les and Andy may have found a work-around to access data.
V	Use the CDS functions of SDWIS/STATE to do compliance for the **DBPR**	Discussed with Flozelle, Brandon, and Sean. Plan is to create statewide crosswalk showing PWSID, System Name, Facility ID for Stage 1, Sample Site ID for Stage 1, and a separate listing for Stage 2 Facility ID and Sample Site ID. This crosswalk will be shared with approved labs. A request will be made to Lewis Wales, who conducts the lab certifications to require systems to report electronically in addition to hard copy as part of their certification requirements. Once these items are accomplished, and the DBP samples are being reported electronically (faster), we can then setup SDWIS to determine compliance for DBP Rule.	DBP/ANALAB Workgroup has made progress. Decided to implement statewide for all systems. Sample results going in automated/faster.	
X	Use the standard response & **PN reporting** portions of SDWIS/STATE to track PN compliance	Already in place for TCR and is used via standard response for most rules.	PN Schedules are created via Standard Response for all rules. Districts have trouble keeping up with workload. LDHH Enforcement accepts issuance of 1 PN violation as end of tier.	Estimate shows 800 past due. Recording Process?
ZA	Modify existing SOPS to include sample schedules updates into SDWIS using the increased/decreased monitoring report functionality.	Can do Quarterly Increases. The decreases aren't part of Public Health Plan- should be part of Chemical Discussion above.	Will be migrating phase II/V schedules for new systems. Qtr increases are unneeded until we start using SDWIS for Phase II/V Compliance	Can occur as soon as item U is completed.

ITEMS DONE

A	Upgrade to SDWIS/STATE WEB RELEASE 2.3	Done	DONE	
D	Show quarterly progress in sampling **Nitrates** annually	Mar 2- DHH plans to begin Nitrate monitoring at source in conjunction with GWR in 2nd Qtr. Will attempt to pull all C, NC and NTNC systems by Dec, 2010. Will migrate in Annual Nitrate Sample Schedules and determine compliance for Nitrates with CDS.	Will have a full set completed for calendar year 2010	
G	Reevaluate all disinfection waivers	Waivers have been recently evaluated. No need to re-evaluate	DONE	
K	Make all quarterly reports by the 45th day after the end of the quarter without prompting from R6	Les has agreed to report to Region 6 within 45 days of end of each quarter.	DONE	
L	Use the CDS functions of SDWIS/STATE to do compliance for the **TCR**	CDS is used (3/4 of districts) and has been used since 2003.	DONE	
M	Develop a plan to check for M or R violations across rules	Improvements should be seen once Nitrates, Ra, and SOCs are sampled consistently.	DONE	
N	Implement the M or R plan		DONE	
O	Use the CDS functions of SDWIS/STATE to do compliance for the **CCR**	As discussed on Mar 2 call, the use of exisiting compliance schedules will allow us to determine compliance for CCR Publish on 7/1 (71 viol) and CCR Certification on 10/1 (72 viol)	DONE 2010	
P	Use the CDS functions of SDWIS/STATE to do compliance for the **LCR**	Sean has agreed to manually determine and enter LCR violations for the first 2 years of 3 year cycle and then use CDS to determine final year. This is the best SDWIS can offer at this time as it does not honor state year schedules.	DONE, will be implementing staggered sample schedules to allow for annual vio in SDWIS, continued development of CC Implementation	In process of revising ~700. Time intensive.
Q	Give monitoring violations for **LCR** annual or longer samples not taken in the June through September time frame in 2009 and 2010	Sean has reset the sampling window to June-Sept to be in compliance with this requirement	DONE	
R	Report all required 90% **LCR** results to FED	SDWIS does determine the 90% summaries and they are reported via FedRep quarterly	DONE	
~~W~~	~~Demonstrate that the new DBPR SOP is being followed at Regional & Central offices~~	~~No one knows what this is, at either EPA or DHH~~	~~DONE~~	Will occur in conjuction with item V
Y	Use the CDS functions of SDWIS/STATE to do compliance for the **GWR**	We are and also intend to automate the creation of triggered source schedules for LUS that can be migrated via DataBridge and MTS	DONE	
Z	Modify existing SOPS to include **inventory updates** in to SDWIS (treatments, flows, populations etc.)	ESS Tool pending implementation	SWIFT Tool implementation	
ZB	Modify existing SOPS to include updating **contact information** into SDWIS/STATE			
ZC	Implement and track a system to ensure SOP updates are implemented at the regional level.	Net Meeting	DONE	